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July 29, 2025

VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *U.S. v. Alon Alexander, et al. No. 24-CR-00676 (VEC)*
Unopposed Motion to Extend Deadline to Reply

Dear Judge Caproni:

On July 18, 2025, the government served the defendants with its 138-page omnibus memorandum of law in opposition to defendant's pretrial motions. See ECF# 121 (filed July 21, 2025). The defendants have until August 1, 2025, to reply. See ECF# 66 at 3.

Sadly, on July 21, 2025, the senior partner of my law firm, Roy Black, passed away. In the ensuing week, I have been shouldering additional responsibilities associated with case management, firm administration and organizing a memorial service, while mourning the loss of my law partner, mentor and friend of thirty years.

Given this intervening circumstance, I am asking the Court's indulgence to extend by one week (until August 8, 2025) the deadline for defendants to reply. The co-defendants join in this request, as we are collaborating to coordinate our filings. Since the filing of the government's response, counsel for Oren Alexander were required to draft and file the initial oversized brief in *Boe v. Marshall*, 11th Cir. No. 25-10973, on July 28, 2025. The government does not oppose. The proposed extension of time will serve the interests of justice and judicial economy, including facilitating redactions as needed. The issues are complex, and the factual and legal analysis required to adequately reply to the government's filing is substantial.

Respectfully submitted,

/s/ Howard Srebnick

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cc: All counsel via ECF

Application GRANTED. Defendants' deadline to file reply papers in support of their pretrial motions is ADJOURNED from Friday, August 1, 2025, to **Friday, August 8, 2025**.

SO ORDERED.



7/30/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE